

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PRESIDENT DONALD J. TRUMP, 45<sup>th</sup> President  
of the United States of America, in his individual  
capacity,

Plaintiff,

v.

3:23-cv-06883- PGG

SIMON & SCHUSTER, INC., a New York  
corporation, ROBERT WOODWARD p.k.a. BOB  
WOODWARD, an individual, and PARAMOUNT  
GLOBAL, a Delaware corporation, f/k/a Viacom  
Inc., successor by merger to CBS Corporation, a  
Pennsylvania corporation f/k/a Westinghouse  
Electric Corporation,

Defendants.

**DECLARATION OF ELIZABETH A. MCNAMARA IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS PLAINTIFF DONALD TRUMP'S AMENDED COMPLAINT**

I, Elizabeth A. McNamara, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

I am a partner at the law firm of Davis Wright Tremaine LLP, attorneys for Defendants Simon & Schuster, Inc., Robert Woodward and Paramount Global (collectively, "Defendants"), and I submit this declaration support of Defendants' motion to dismiss the Amended Complaint in the above-captioned action. This declaration is based on my personal knowledge, except as otherwise indicated.

1. Annexed hereto as **Exhibit A** is a true and correct copy of the paperback edition of *The Trump Tapes* by Bob Woodward.<sup>1</sup>

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<sup>1</sup> Pursuant to the Order dated April 5, 2023 (Dkt. 30), Defendants have submitted Exhibit A to the Court in compact disk and hard copy formats.

2. Annexed hereto as **Exhibit B** is a true and correct copy of the audiobook edition of *The Trump Tapes* by Bob Woodward.<sup>2</sup>

3. Annexed hereto as **Exhibit C** is a true and correct copy of the brief that Plaintiff President Donald J. Trump (“President Trump”) filed in *Carroll v. Trump*, 20-3977 (2d Cir.) on January 15, 2021.

4. Annexed hereto as **Exhibit D** is a true and correct copy of the brief that President Trump filed in *Trump v. Carroll*, 22-SP-745 (D.C.) on November 9, 2022.

Dated: August 23, 2023

/s/ Elizabeth A. McNamara

Elizabeth A. McNamara

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<sup>2</sup> Pursuant to the Order dated April 5, 2023 (Dkt. 30), Defendants have submitted Exhibit B to the Court in compact disk format.